

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re: Mary Giesin,	:	Bankruptcy Case No. 19-20451-CMB
	:	
Debtor.	:	Chapter 13
	:	
_____ Mary Giesin,	:	
	:	Document No.: 58
Movant,	:	
	:	Related to Document No.:
v.	:	
	:	Related to Claim No.: 5
Freedom Mortgage Corporation,	:	
	:	
Respondent.	:	
	:	

DEBTOR'S DECLARATION OF SUFFICIENT PLAN FUNDING

Pursuant with the Notice of Mortgage Payment Change filed on November 2, 2021, after reasonable investigation and upon review of the existing Chapter 13 Plan, it appears to Debtor that the existing payment is sufficient to fund the Plan even with the proposed change for December 1, 2021.

The new post-petition monthly payment payable to Respondent is \$1,179.63, effective December 1, 2021, per the notice dated November 2, 2021. The Debtor's Plan payment provides for a monthly payment to Freedom Mortgage Corporation of \$1,232.00. Therefore, Debtor's Plan remains sufficient.

Respectfully Submitted,

Date: November 16, 2021

/s/Brian C. Thompson
Brian C. Thompson, Esquire
Attorney for Debtor
PA I.D. # 91197
Thompson Law Group, P.C.
125 Warrendale Bayne Road, Suite 200
(724) 799-8404 Telephone
(724) 799-8409 Facsimile
bthompson@thompsonattorney.com